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May 20, 2005

VIA FEDERAL EXPRESS

U.S. Environmental Protection Agency
ATTN: Mrs. Mila V. Bensing
Emergency Enforcement & Support Section,
SE-5J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Re: 104(e) Response on Behalf of Kohl & Madden Quality Printing Ink

Dear Mrs. Bensing:

Please find enclosed the response of Kohl & Madden Quality Printing Ink to the Request for Information Pursuant to Section 104 of CERCLA for the IWI Inc. Site in Summit, Illinois.

Sincerely,

SONNENSCHN NATH & ROSENTHAL LLP

By:

Elizabeth A. Leifel

Enclosure

cc Carl Raycroft (w/encl.)

**RESPONSE OF KOHL & MADDEN QUALITY PRINTING INK
TO THE INFORMATION REQUEST OF THE U.S. EPA DATED MARCH 7, 2005
RELATING TO THE IWI INC. SUPERFUND SITE**

In response to the Information Request of the United States Environmental Protection Agency ("U.S. EPA") dated March 7, 2005, to Kohl & Madden Quality Printing Ink and relating to the IWI Inc. Superfund Site ("Site") in Summit, Illinois, Kohl & Madden Quality Printing Ink ("Kohl & Madden") responds pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq. ("CERCLA").

These responses are based on (1) information from interviews of Kohl & Madden's current and former employees believed to have knowledge concerning Kohl & Madden's operations; and (2) a record search for all company files known to be likely to contain documents and records relevant to the Information Request.

In response to the Questions, Kohl & Madden states as follows:

Question No. 1:

Identify all persons consulted in the preparation of the answers to these Information Requests.

Response:

Attorneys with Sonnenschein Nath & Rosenthal LLP have been involved in preparing the responses to the questions contained in U.S. EPA's request. In further response, Kohl & Madden states that the following employees and former employees of Kohl & Madden and of Sun Chemical were contacted in preparing responses to these Requests:

Name	Position	Location
Carl Raycroft	Environmental Health & Safety Manager, Sun Chemical	Northlake, IL
Dennis Coakley	Former Vice President of Operations, K&M	Nashville, TN
Rick Hazelwood	Former Plant Manager, Harding Drive Facility, K&M	Nashville, TN
Nick Aselta	Corporate Controller for K&M	Fort Lee, NJ
Mike Beckman	Site Manager, Sun Chemical	Nashville, TN

Question No. 2:

Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

Response:

Respondent objects to Request No. 2 as overbroad because it apparently requires Respondent to provide copies of all files and documents examined in preparing answers, regardless of whether such files are responsive to the information request.

Subject to and without waiving the foregoing objection, Kohl & Madden responds that in preparing the responses to these Requests, and to the best of its knowledge, all relevant records of Kohl & Madden were reviewed. These included environmental files, accounts payable documentation, and waste manifests located at the Sun Chemical facility at 2940 Kraft Drive, Nashville, TN, and at Kohl & Madden's corporate office located in Fort Lee, NJ. After Kohl & Madden's two Nashville facilities, located at 406 Harding Industrial Drive ("Nashville 1") and 414 Harding Industrial Drive ("Nashville 2"), were closed in approximately 2003 and 2002 respectively, records from each facility were either transferred to Sun Chemical's Kraft Drive facility, or were left at the Harding sites. To the extent any documents and/or files were left at the Harding sites and not transferred to the Kraft Drive facility or to Kohl & Madden's corporate office in Fort Lee, NJ, they were not available for review. Kohl & Madden's search for responsive documents continues, and Kohl & Madden will supplement this response if any such documents are discovered.

Question No. 3:

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response:

Kohl & Madden is unable to identify any persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents. Kohl & Madden's investigation continues.

Question No. 4:

List the EPA Identification Numbers of the Respondent.

Response:

Kohl & Madden objects to Request No. 4 on the grounds it is overbroad and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site.

Subject to and without waiving the foregoing objection, Kohl & Madden provides that the EPA ID Number for the closed Nashville facilities was TND078233749.

Question No. 5:

Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom.

Response:

Kohl & Madden objects to Request No. 5 on the grounds it is overbroad and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site.

Kohl & Madden has no knowledge or information responsive to Request No. 5. Kohl & Madden's investigation continues.

Question No. 6:

Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances by you, your contractors, or by prior owners and/or operators.

Response:

Kohl & Madden objects to Request No. 6 on the grounds it is vague, ambiguous, overbroad and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site.

Subject to and without waiving the foregoing objection, Kohl & Madden identifies the person(s) listed in its Answer to Request No. 1 as the most knowledgeable concerning Kohl & Madden's operations relative to the Site. Additional persons who may have knowledge concerning these information requests include the Site owners and operators, and regulatory and enforcement personnel, and contractors of U.S. EPA and Illinois EPA.

Question No. 7:

Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no," identify:

(a) The chemical composition, characteristics, physical state (e.g. solid, liquid) of each hazardous substance;

(b) Who supplied you with such hazardous substances;

(c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;

(d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;

(e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you; and

(f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.

Response:

Kohl & Madden objects to Request No. 7 on the grounds it is vague, ambiguous, overbroad and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site. In particular, the scope of information requested would require Kohl & Madden, a Division of Sun Chemical Corporation, the world's largest producer of printing ink, to report on every hazardous substance used in all its domestic and international operations.

Subject to and without waiving the foregoing objection, Kohl & Madden responds that it engages in the business of selling various kinds of ink, including heatset ink, which has a mineral oil base. This heatset ink is non-hazardous. Kohl & Madden stores this ink in bins of approximately 3300 lbs (350 gal.). The heatset ink is thick, and when the bins are emptied, there remains a residue of the heatset ink on the walls of the bins. Kohl & Madden contracts with various entities to clean the bins periodically and remove the residual heatset ink left in the bins. On information and belief, Kohl & Madden may have contracted with Itasco to perform this service during the mid-1990s. Kohl & Madden has been unable to locate any documents relating to its interaction with Itasco; however, Kohl & Madden's investigation continues. In the event that any such documents are found, Kohl & Madden reserves the right to supplement this response accordingly.

Question No. 8:

Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

Response:

Kohl & Madden objects to Request No. 8 as overbroad, and unduly burdensome and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site. Furthermore, Kohl & Madden objects to the request because the requested information relates to its ability to pay, particularly where its liability, if any, is likely to be de micromis or de minimis.

Subject to and without waiving the foregoing objection, Kohl & Madden responds that it does not intend to claim financial hardship in the event that it is determined to be liable for a portion of the Site.

Question No. 9:

If Respondent is a Corporation, respond to the following requests:

- (a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
- (b) Provide Respondent's audited financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service. If audited financial statements are not available, please state the reasons that they are not available, and provide the financial statements that management would review at the conclusion of each fiscal year.
- (c) Identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.
- (d) Provide a list of any investments that the Corporation may own. For example, any ownership in stock should list Corporate name, number of shares owned, and price at a current specific date. Ownership of real estate should itemize property location, type of property (land, office building, factory, etc.), size of property, purchase price, and current market valuation. These schedules should agree with financial statement presentations.

Response:

Kohl & Madden objects to Request No. 9 as overbroad, and unduly burdensome and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site. Furthermore, Kohl & Madden objects to the request because the requested information relates to its ability to pay, particularly where its liability, if any, is likely to be de micromis or de minimis.

Subject to and without waiving the foregoing objection, Kohl & Madden responds that it does not intend to claim financial hardship in the event that it is determined to be liable as to a portion of the Site.

Question No. 10:

If Respondent is a Partnership, provide copies of the Partnership Agreement.

Response:

Not applicable.

Question No. 11:

If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

Response:

Not applicable.

Question No. 12:

Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of totes, containers, drums, barrels, pails, or waste materials, including hazardous substances, at the Site or to the Site or for transshipment through the Site. In addition, identify the following:

- (a) The persons with whom you or such other persons made such arrangements, including, but not limited to [provide list of transporters];
- (b) Every date on which such arrangements took place;
- (c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance which may have been stored in totes, containers, drums, barrels, or pails;
- (d) The owner of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances so accepted or transported;
- (e) The quantity of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- (f) All tests, analyses, and analytical results concerning the totes, containers, drums, barrels, pails, or waste materials;
- (g) The person(s) who selected the Site or transshipment of totes, containers, drums, barrels, pails, or waste materials through the Site as the place to which the waste materials or hazardous substances were to be transported;
- (h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- (i) Where the person identified in g. above intended to have such totes, containers, drums, barrels, pails, hazardous substances, or waste materials transported and all evidence of this intent.

- (j) Whether the totes, containers, drums, barrels, pails, waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- (k) What was actually done to the totes, containers, drums, barrels, pails, or waste materials or hazardous substances once they were brought to the Site;
- (l) The final disposition of each of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved in such transactions;
- (m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the totes, containers, drums, barrels, pails, or waste material and hazardous substances involved in each transaction;
- (n) The type and number of totes, containers, drums, barrels, or pails in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such totes, containers, drums, barrels, pails, or containers;
- (o) The price paid for transport or disposal or treatment of each tote, container, drum, barrel, pail, waste material and hazardous substance;
- (p) All documents containing information responsive to a) - o) above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- (q) All persons with knowledge, information, or documents responsive to a) - p) above.

Response:

Sun Chemical objects to Request No. 12 on the grounds it is vague, ambiguous, overbroad and not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Site.

Subject to and without waiving the foregoing objection, Sun Chemical responds that it has no knowledge of any persons who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of totes, containers, drums, barrels, pails, or waste materials, including hazardous substances, at the Site or to the Site or for transshipment through the Site.

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